

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR No. 22-CR-424 MIS

RICKY L. ROMERO, JR.,

Defendant.

SECOND UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE

COMES NOW, the Defendant, Ricky L. Romero Jr., by and through his attorney of record, Assistant Federal Defender Assistant, Darren Robinson, and hereby moves to amend conditions of release to allow Mr. Romero to travel outside of his county of residence for work and in support thereof states:

1. A redacted indictment was filed in the above matter charging Mr. Romero with two crimes.
2. On March 23, 2022, The Court held a pretrial detention hearing and ordered Mr. Romero released under several conditions, including the condition that he be prohibited from traveling outside his county of residence except to travel to Court in Dona Ana County, NM.
3. The Court declined to order condition 7F, which would allow probation discretion to expand said travel.
4. The Court ordered that Mr. Romero continue his employment.
5. Mr. Romero's employment sometimes requires travel to counties other than Chaves or Dona Ana Counties. Accordingly, Mr. Romero requests that the Court modify his conditions of release to allow Mr. Romero to travel for work with approval from his probation

officer.

6. Defense has contacted AUSA Joni Stahl and USPO Kelly Barela about changing the conditions of release to allow said employment-related travel. Both have confirmed that they do not oppose.

THEREFORE, Mr. Romero respectfully requests that the Court change the conditions of release to allow pretrial services to expand travel within the US.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
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Electronically filed on April 20, 2022
By: /s/ Darren Robinson
DARREN ROBINSON
Assistant Federal Public Defender